

EXHIBIT E

)	
LEA ALLISON, <i>et al.</i> , on behalf of)	
themselves and those similarly situated,)	
)	
Plaintiffs,)	
)	Case No.
v.)	
)	(Class Action)
BRADLEY R. ALLEN, SR., in his official)	
capacity as Chief District Court Judge, <i>et al.</i> ,)	
)	
Defendants.)	

I, Irena Como, hereby declare under penalty of perjury:

2. I was first licensed in 2009 and have continuously practiced law since that time. Prior to joining the ACLU of North Carolina in June 2016, I represented clients in trial and appellate proceedings in state court as staff attorney for the Legal Aid Society of New York. At the ACLU of North Carolina, I have been co-counsel of record in several complex and class action federal civil rights cases on behalf of plaintiffs seeking declaratory and injunctive relief in federal and state courts, including but not limited to: a class action challenging the use of solitary confinement in state prisons, *Dewalt v. Hooks*,

19-cv-14089 (N.C. Super. Ct. filed October 16, 2019); a class action challenging North Carolina's practice of wealth-based punishment in the form of driver's license revocation for inability to pay traffic fines and costs, *Johnson v. Jessup*, 1:18-cv-0467 (M.D.N.C. filed May 30, 2018); a challenge to North Carolina's 20-week ban on abortion, *Bryant v. Woodall*, 1:16-cv-01368 (M.D.N.C. filed November 30, 2016); a challenge to House Bill 2, which discriminated against transgender individuals in their the use of public facilities, *Carcaño v. McCrory, et. al.*, 1:16-cv-00236 (M.D.N.C. filed March 28, 2016); and a challenge to a public charter school's discriminatory uniform policy, *Peltier v. Charter Day School*, 7:16-cv-00030 (E.D.N.C. filed February 29, 2016).

3. The ACLU of North Carolina has a full docket of public interest impact litigation in North Carolina's state and federal courts. Our docket is focused on civil litigation to protect constitutional freedoms. We also regularly litigate cases in federal court on behalf of plaintiffs seeking declaratory and injunctive relief. In my role as Acting Legal Director, I manage a staff of attorneys in addition to serving as counsel in litigation brought by the ACLU of North Carolina.

4. ACLU of North Carolina has assigned three qualified attorneys to litigate this case: myself, Ms. Leah Kang, and Ms. Ann Webb.

5. My colleague and co-counsel Leah Kang is an attorney at the ACLU of North Carolina, where she has worked full time since August 2019. Ms. Kang was first licensed in 2012 and has continuously practiced law since that time. Prior to joining the ACLU of North Carolina, Ms. Kang was a Staff Attorney at Forward Justice, where she was co-counsel of record in several federal civil rights cases, including several complex voting

rights cases, on behalf of plaintiffs seeking declaratory and injunctive relief in federal and state courts. Ms. Kang has also served as a judicial law clerk to federal judges in the U.S. District Court for the District of Maryland and the U.S. Court of Appeals for the First Circuit. Her current work at the ACLU-NCLF includes multiple complex civil rights litigation, including the federal class action lawsuit, *Johnson v. Jessup*, 1:18-cv-0467 (M.D.N.C. filed May 30, 2018).

6. My colleague and co-counsel Ann Webb is an attorney and policy counsel at the ACLU of North Carolina, where she has worked full time since December 2018. Ms. Webb was first licensed in 2012 and has continuously practiced law since then. Prior to joining the ACLU of North Carolina, Ms. Webb was an attorney for six years in the U.S. Department of Labor's Office of the Solicitor, which she joined through the Honors Attorney Program. In that position, Ms. Webb litigated complex appellate cases, including briefing and argument before the U.S. Courts of Appeals for the Fourth, Eighth, and Ninth Circuits and the Department's administrative appeals boards in whistleblower protection, workplace safety, and wage and hour matters.

7. In bringing this action, the ACLU of North Carolina is co-counseling with attorneys at the American Civil Liberties Union Foundation ("ACLU") and Civil Rights Corps ("CRC").

8. In partnership with our co-counsel at ACLU and CRC, the ACLU of North Carolina has spent substantial time and effort investigating this case to understand how the Alamance County criminal court system functions. This includes conducting jail visits, watching court proceedings, conducting interviews with individuals detained under the bail

system in Alamance County, collecting and discussing jail records, and conducting substantial research on constitutional and statutory protections for pretrial liberty.

9. The ACLU of North Carolina is prepared to contribute significant resources to represent the class in this case. Together, Plaintiffs' counsels have paid for all costs associated with this litigation to date and will continue to do so.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 8th day of November 2019.



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